REMARKS

In the Office Action mailed September 24, 2004, the Examiner has rejected all of the pending claims 1-5. Claims 1-2 have been amended. Claims 3-5 have been canceled, and claims 6, 7 and 8 have been added. Thus, independent claims 1-2 and 6-8 are pending and under consideration. No new matter has been added. The rejections are traversed below.

Objection to Title

In accordance with the Examiner's suggestion, Applicants have replaced the title with "Computer Readable Medium Containing HTML Document Generation Program Utilizing Extended Tags."

REJECTION UNDER 35 U.S.C. § 112

The Examiner has rejected claim 2 under 35 U.S.C. § 112, second paragraph, as being allegedly indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Claim 2 has been amended, and the reference to the term "a second type" has been removed from the claim.

REJECTION UNDER 35 U.S.C. § 101

Claim 4 has been rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Claim 4 has been canceled. Thus, the Examiner's rejection of claim 4 is now moot.

REJECTION UNDER 35 U.S.C. § 102

Claims 3, 4 and 5 have been rejected under 35 U.S.C. § 102(b) as being patented/ described by U.S. Patent No. 5,937,160, issued to Davis *et al.* (hereinafter Davis). Applicants have canceled claims 3, 4 and 5, thereby rendering the rejection of claims 3, 4 and 5 moot. Applicants respectfully submit that newly amended claim 1 and new claims 6 and 7 are patentable over Davis, as Davis does not teach each and every element of the claims. Claims 6 and 7 express currently amended claim 1 in method and apparatus claim formats, respectively.

In the present invention, as defined by currently amended claim 1 and new claims 6 and 7, the HTML document read by the computer in the reading step of the above-identified claims has been embedded with unfavorable element tags by the function of a common HTML editor. The unfavorable element tags enclosing a predetermined extended tag are recognized and deleted through the recognizing and deleting steps. *See* Specification, page 3, line 18 – page 4, line 13 and page 15, lines 11-13. *See also* Specification, page 22, line 23 – page 23, line 2.

In contrast to the present invention as defined by amended claim 1 and new claims 6 and 7, Davis discloses a system, method and computer program product for automatically revising a hypertext document stored on a computer server connected to a network. In particular, an email message including a content revision for an area of the hypertext document is created and transmitted to the server. The message identifies the hypertext document and markup tag for the area. The identified markup tag in the hypertext document is then replaced with the content revision contained within the email message. Davis clearly states that each tag is simply replaced, line by line, with text from the email message. *See* Davis, column 12, lines 22-26.

Applicants respectfully submit that simply replacing a tag with text is not tantamount to or even related to, "recognizing an extended tag which is defined so that the extended tag itself does not develop into text within the HTML document. . .," as recited in new independent claim 1, for example. Applicants also submit that Davis does not teach, "deleting an HTML tag pair which encloses only an extended tag or which encloses no element within the HTML document within which said recognizing has been executed," as recited by claim 1, for example. Applicants further submit that unlike the present invention, Davis provides no solution to the problems caused when a common HTML editor edits a source HTML document including extended tags such as those recited in claim 1.

Therefore, Applicants submit that amended claim 1 and new claims 6 and 7 are patentable over Davis for at least the reasons offered above.

REJECTION UNDER 35 U.S.C. § 103

The Examiner has rejected claims 1 and 2 under 35 U.S.C. § 103(a) as being unpatentable over Davis. Currently amended claim 1 recites, in relevant part, "recognizing an extended tag which is defined so that the extended tag itself does not develop into text within the HTML document . . .." Applicants respectfully submit that newly amended claim 1 is patentable over Davis as Davis does not teach or suggest the feature of the claim identified by the above-

quoted language. Davis also does not teach or suggest deleting an HTML tag pair, as recited by claim 1. Rather, Davis merely discloses that each tag is replaced, line-by-line. *See* Davis, column 12, lines 22-26.

As defined by newly amended claim 2, in the present invention, the HTML document read by the computer during the reading step has been edited by an HTML editor so that "dummy data," that is, arbitrary text and identification extended tags, are added to each HTML tag relating to character style. *See* Specification, page 6, line 16 – page 7, line 2. Each tag relating to the character style and its adjoining predetermined identification extended tag is automatically interchanged. The "dummy data" is then deleted through the recognizing and deleting steps of claim 2.

Applicants respectfully submit that claim 2 is patentable over Davis, as Davis does not teach or suggest, adding arbitrary text after an HTML start tag and prior to an HTML end tag, as recited in the editing step of claim 2. As previously indicated, Davis simply replaces each tag, line by line, with text from the email message. Thus, in light of the foregoing, Applicants submit that claims 1 and 2 are patentable over Davis.

Regarding new claim 8, Applicants submit that the claim is patentable over Davis, as Davis does not teach or suggest ignoring undesirable tags. As previously stated, Davis simply replaces all tags with text.

It is submitted that the claims satisfy the requirements of 35 U.S.C. §§ 102 and 103. It is further submitted that the claims are not taught, disclosed or suggested by the references. The claims are therefore in a condition suitable for allowance, and Applicants respectfully request that the rejections be withdrawn. In addition, an early Notice of Allowance is respectfully requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

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